

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

) MDL No. 2817
) Case No. 1:18-CV-00864

This document relates to:

THE DEALERSHIP CLASS ACTION

)
)
) Hon. Robert M. Dow, Jr.
) Magistrate Judge Jeffrey T. Gilbert

**THE REYNOLDS AND REYNOLDS COMPANY’S MOTION TO CLARIFY ITS
DISCOVERY RIGHTS AND OBLIGATIONS IN LIGHT OF ITS ARBITRATION
RIGHTS AND THE CASE MANAGEMENT ORDER**

Defendant The Reynolds and Reynolds Company (“Reynolds”) hereby moves, pursuant to the authorities cited in the accompanying memorandum of law, for an order clarifying its discovery rights and obligations in light of its arbitration rights and the Court’s Case Management Order (“CMO”) (Dkt. 166). Reynolds must be able to either participate fully in discovery in the Dealership Class Action now without waiving its arbitration rights, or be permitted to reserve its rights to participate in discovery later should it not be compelled to arbitration.

In support of this Motion, Reynolds incorporates by reference the memorandum of law filed concurrently herewith, any reply memorandum that Reynolds may file, and any oral argument that the Court may allow at a hearing on this Motion.

Dated: August 24, 2018

Respectfully submitted,

/s/ Aundrea K. Gulley

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Reynolds Company*

CERTIFICATE OF SERVICE

I, Leo D. Caseria, an attorney, hereby certify that on August 24, 2018, I caused a true and correct copy of the foregoing **THE REYNOLDS AND REYNOLDS COMPANY'S MOTION TO CLARIFY ITS DISCOVERY RIGHTS AND OBLIGATIONS IN LIGHT OF ITS ARBITRATION RIGHTS AND THE CASE MANAGEMENT ORDER**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Leo D. Caseria
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